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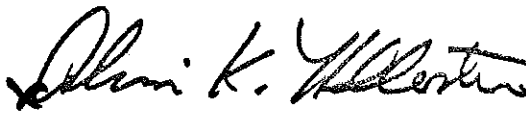
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So ordered. The conference
scheduled for July 11, 2025
is adjourned to October 3,
2025.

May 19, 2025

Re: *Comcast Cable Communications Management, LLC, et al. v. MaxLinear, Inc.*, No. 23-cv-04436-AKH

The Honorable Alvin K. Hellerstein
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007


5/19/2025

Dear Judge Hellerstein:

We represent Plaintiffs-Counterclaim Defendants Comcast Cable Communications Management, LLC and Comcast Cable Communications, LLC (together, "Comcast") in the above-referenced action. Pursuant to Rule 1(D) of Your Honor's Individual Rules, we write jointly with counsel for Defendant-Counterclaim Plaintiff MaxLinear, Inc. ("MaxLinear") to request (i) an extension of the fact discovery deadline set forth in the Civil Case Management Plan (ECF No. 152) from June 18, 2025 to September 18, 2025 and (ii) an adjournment of the July 11, 2025 case management conference until October 3, 2025, or a date that is more convenient for the Court following the conclusion of fact discovery should the fact discovery deadline be extended.

The parties have substantially completed document productions, are continuing to productively meet and confer regarding various document discovery issues, and are preparing to commence discussions about likely deponents and a reasonable deposition schedule. However, despite the parties' significant progress to date, the parties respectfully submit that there is good cause to extend the fact discovery deadline. Among other reasons, the parties are diligently addressing technical and/or logistical issues with respect to the collection of text-message data from certain custodians and would like to have all such issues resolved sufficiently in advance of depositions so that the parties may utilize those text messages for questioning. The parties also recently received a substantial production (comprising approximately 30,000 documents) from a key third party independently subpoenaed by each side and anticipate receiving the first in what is likely to be a series of rolling document productions from another, similarly situated third party in the coming days. This third-party discovery is highly relevant to the claims and defenses in this matter and may significantly inform both parties' approach to deposition discovery. In addition, the parties are working in good faith to resolve certain disputes with respect to document discovery from centralized repositories and privilege logs and would like to ensure there is sufficient time to review any revised logs or additional documents that may be produced in connection therewith before depositions commence. Finally, the parties' request for a three-month extension anticipates at least some challenges in scheduling depositions during the summer months and accounts for the fact that at least three non-parties and multiple former employees of one or both parties are likely to be deposed.

This is the parties' first request for an extension of the discovery schedule. The specific dates relevant to the requested extension and adjournment, including the current dates and proposed extended dates, are set forth below:

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EVENT	CURRENT DATE	REQUESTED EXTENSION
Deadline for Non-Expert Discovery:	June 18, 2025	September 18, 2025
Case Management Conference:	July 11, 2025	October 3, 2025

A Proposed Amended Case Management Plan adopting the schedule proposed above is attached hereto as **Exhibit A**.

* * *

We are available to provide any additional information that would be helpful and thank the Court for its consideration.

Respectfully submitted,

/s/ Atif N. Khawaja

Atif N. Khawaja
Counsel for MaxLinear

Respectfully submitted,

/s/ Dana M. Seshens

Dana M. Seshens
Counsel for Comcast

cc: All Counsel of Record (via ECF)